

# EXHIBIT C

**Gayle-Luz, Keisha**

---

**From:** Matthias Kamber <mkamber@keker.com>  
**Sent:** Wednesday, June 23, 2021 6:48 PM  
**To:** McGonagle, Dan  
**Cc:** Singular; kvsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com  
**Subject:** Re: Singular v. Google - deposition scheduling

Dan,

We do not have an address for Mr. Chen and do not know of counsel who currently represents him. That said, we believe that this is the LinkedIn entry for the person that you intended to notice for deposition: <https://www.linkedin.com/in/johnnychen/>

Matthias

On Jun 22, 2021, at 3:06 PM, McGonagle, Dan <[dmgonagle@princelobel.com](mailto:dmgonagle@princelobel.com)> wrote:

**[EXTERNAL]**

---

Matthias,

With regards to Mr. Johnny Chen, please provide his current address so that he can be served with a subpoena or direct us to his counsel who currently represents him.

Thanks,

Dan McGonagle  
 PRINCE LOBEL  
Prince Lobel Tye LLP  
One International Place, Suite 3700  
Boston, Massachusetts 02110  
617.456.8081 Direct  
[dmgonagle@princelobel.com](mailto:dmgonagle@princelobel.com)



---

**From:** Matthias Kamber [<mailto:mkamber@keker.com>]  
**Sent:** Tuesday, June 22, 2021 4:40 PM  
**To:** Singular <[Singular@princelobel.com](mailto:Singular@princelobel.com)>  
**Cc:** [kvsingular@keker.com](mailto:kvsingular@keker.com); [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); [abhansali@kblfirm.com](mailto:abhansali@kblfirm.com);

[mkwun@kblfirm.com](mailto:mkwun@kblfirm.com)

**Subject:** RE: Singular v. Google - deposition scheduling

Counsel: one further update to the information below (Quoc Le is available for deposition on July 13). I have noted that inline as well. Please confirm/provide dates as soon as possible and we will continue to do so as well.

---

**From:** Matthias Kamber  
**Sent:** Tuesday, June 22, 2021 10:17 AM  
**To:** [singular@princelobel.com](mailto:singular@princelobel.com)  
**Cc:** kvp-singular <[kvpsingular@keker.com](mailto:kvpsingular@keker.com)>; [wgs-singularv.google@wolfgreenfield.com](mailto:wgs-singularv.google@wolfgreenfield.com); Asim Bhansali ([abhangsali@kblfirm.com](mailto:abhangsali@kblfirm.com)) <[abhangsali@kblfirm.com](mailto:abhangsali@kblfirm.com)>; Michael Kwun ([mkwun@kblfirm.com](mailto:mkwun@kblfirm.com)) <[mkwun@kblfirm.com](mailto:mkwun@kblfirm.com)>  
**Subject:** Singular v. Google - deposition scheduling

Counsel,

With all of the correspondence regarding deposition scheduling, we thought it would be helpful to memorialize where things currently stand and what depositions remain to be scheduled. To that end, here is a chart of depositions noticed and/or requested by Singular, including of third-party witnesses formerly employed by Google, as well as related confirmed or offered dates (including one or two new ones).

	<b>Witness</b>	<b>Date Offered</b>	<b>Confirmed</b>	<b>Notes</b>
1	James Patterson	3/25	Yes	Completed
2	Catherine Tornabene	4/19	Yes	Completed
3	Obi Felten	5/28	Yes	Completed
4	James Laudon	6/24		
5	Andrew Ng	6/26	Yes	
6	Andrew Phelps	7/1		
7	Tammo Spalink	7/8		
8	Nishant Patil	7/9		
9	Astro Teller	7/9		
10	Peter Brandt	7/14		
11	Norman Jouppi	7/16		
12	James Mccoun	7/16		
13	Jeff Dean	7/21		
14	Andrew Swing	7/22		
15	Matthew Mabey	TBD		
16	Quoc Le	<b>7/13</b>		
17	Olivier Temam	TBD		
18	Google 30(b)(6)	TBD		
19	Sebastian Thrun	TBD		
20	Johnny Chen	TBD		
21	Jianmin Chen	TBD		

A few related notes:

- Johnny Chen is not an employee at Waymo; there is another Johnny Chen employed there, but it is not the person you intended to notice for deposition.

- Jianmin Chen is also not a Google employee.
- We continue to work on dates for various witnesses represented by us (which does not include Sebastian Thrun, and—at least as of yet—Johnny Chen and Jianmin Chen).
- With respect to Olivier Temam, he is based in France and there are particular procedural requirements for taking the deposition of a French citizen based in France, which we leave to Singular to address in the first instance, though we are happy to cooperate in whatever way we can. See <https://fr.usembassy.gov/taking-evidence-in-france-in-civil-and-commercial-matters/>
- Finally, note that Singular is currently 5 depositions over the 16-deposition limit agreed to by the parties. See ECF No. 54. Please let us know which depositions Singular does not want to pursue; it is not proper to ask Google to spend time getting availability and beginning deposition preparation for witnesses that Singular has neither an intent nor an ability to take pursuant to the agreed discovery limits.

With respect to depositions Google has either noticed or requested dates for, below is a summary of what we believe is the current status:

	<b>Witness</b>	<b>Date Offered</b>	<b>Confirmed</b>	<b>Notes</b>
1	Robert Colwell	6/24	Yes	
2	Michael Holzrichter	6/29	Yes	
3	Daniel Hammerstrom	7/13	Yes	
4	Stephen Boyd	7/22	Yes	
5	Joe Bates	7/20 & 23		
6	Robert Plotkin	7/22 or 23		Google prefers 7/23
7	Mustafa Ozgen	7/23	Yes	
8	Cambridge Research Analytics	8/5		
9	Kent Arnold	TBD		Awaiting dates
10	Steve Stecyk	TBD		Awaiting dates
11	Mark Beal	TBD		Awaiting dates
12	Intrinsix	TBD		Awaiting dates
13	MIT	TBD		Awaiting dates
14	Joshua Tenenbaum	TBD		Awaiting dates
15	Joe Zimmerman	TBD		Awaiting dates
16	30(b)(6) of Singular	TBD		Awaiting dates

Please provide dates for the various witnesses represented by Prince Lobel (e.g., Intrinsix, Arnold, Stecyk, and Beal), and we will let you know when other third-party witnesses are available (e.g., Zimmerman, MIT, Tenenbaum, and Plotkin). We are also trying to determine whether and when CRA might be available for deposition during the fact-discovery period but reserve the right to press for a different date for the convenience of both CRA and the parties.

With respect to the deposition of Dr. Bates, we see no reason to split it over non-consecutive days. That arrangement is particularly unusual and inefficient; therefore, please provide two consecutive days the week of July 19<sup>th</sup>.

Regards,

Matthias

---

**Matthias Kamber (he/him/his)**

Keker, Van Nest & Peters LLP  
633 Battery Street  
San Francisco, CA 94111-1890  
+14157736635 direct | 415 391 5400 main  
[mkamber@keker.com](mailto:mkamber@keker.com) | [vcard](#) | [keker.com](http://keker.com)

---

This email is intended for the confidential use of the addressees only. Because the information is subject to the attorney-client privilege and may be attorney work product, you should not file copies of this email with publicly accessible records. If you are not an addressee on this email or an addressee's authorized agent, you have received this email in error; please notify us immediately at 617 456 8000 and do not further review, disseminate or copy this email. Thank you.

---

-----  
IRS Circular 230 Disclosure: Any federal tax advice or information included in this message or any attachment is not intended to be, and may not be, used to avoid tax penalties or to promote, market, or recommend any transaction, matter, entity, or investment plan discussed herein. Prince Lobel Tye LLP does not otherwise by this disclaimer limit you from disclosing the tax structure of any transaction addressed herein.